



February 10, 2015

Mary Ellen Winborn, Director
Clallam County Department of Community Development
SMP Comment
223 E. 4th St., Suite 5
Port Angeles, WA 98362

RE: Port of Port Angeles Comments on Draft (November 2014) Clallam County
Shoreline Master Program

Dear Mrs. Winborn:

The Port of Port Angeles appreciates the opportunity to provide comments to the County on the Draft (November 2014) Shoreline Master Program. The Port respects the amount of time and effort applied by the County Staff and all the stakeholders in preparing this document.

This letter includes an attachment that provides a detailed matrix containing our suggestions for alternative language in regards to parking, the use of "water-oriented" and a recommendation that the buffer in the Marine Waterfront SED be reduced from 100 feet to 25 feet. Thank you for the opportunity to comment.

Sincerely,

PORT OF PORT ANGELES

Jesse Waknitz
Environmental Manager
Attachment A – Port Comments

Attachment A: Matrix containing suggested alternative language by section for the Nov 2014 Draft SMP

Draft SMP Section	SMP Draft Language	Suggested Edit/action (Highlighted Bold Blue)	Explanation of Suggested Edit
<p>Chapter 2: Shoreline Environmental Designations</p> <p>Section 2.9 Allowed Uses in Each Shoreline Environment Designation, Table 2-2</p> <p>Page 2-21</p>	<p>3. Non-water-oriented commercial use/development may be allowed as part of a mixed use if consistent with the criteria in Section 3.3 of this Program.</p>	<p>3. Non-water-oriented industrial and commercial use/development may be allowed as part of a mixed use if consistent with the criteria in Section 3.3 of this Program.</p>	<p>This allows industrial use defined in the DRAFT SMP as “the production, processing, manufacturing, or fabrication of goods or materials. Warehousing and storage of materials or production is considered part of the industrial process.”, and is in-line with Section 3.3.2 (8).</p>
<p>Chapter 3: Policies and Regulations for Specific Shoreline Uses and Developments</p> <p>Section 3.3 Commercial and Industrial Development, Subsection 3.3.1 Policies</p> <p>Page 3-10</p>	<p>2. Commercial and industrial use and development should be located outside of shoreline jurisdiction unless the use/development is water-related. Preference should be given first to water-dependent uses, then to water-related, and water-dependent uses. When permitted, the scale and degree of disturbance associated with the commercial and industrial use/development should be minimized.</p>	<p>2. Commercial and industrial use and development should be located outside of shoreline jurisdiction unless the use/development is water-dependent or water-related water-oriented. Preference should be given first to water-dependent uses, then to water-related, and water-related uses. When permitted, the scale and degree of disturbance associated with the commercial and industrial use/development should be minimized.</p>	<p>Water-oriented should be used in-place of water-dependent and/or water-related in this section and throughout the DRAFT document so that it is clear that recreational and public access to the shoreline is a top priority in the SMP.</p>
<p>Chapter 3: Policies and Regulations for Specific Shoreline Uses and Developments</p> <p>Section 3.6 Parking, Subsection 3.6.2 Regulations</p> <p>Page 3-19</p>	<p>5. If permitted within shoreline jurisdiction, parking facilities shall be located landward of shoreline buffers identified in Tables 6-1 and 6-2.</p> <p>10. Parking facilities serving individual buildings shall be located landward of the principal building being served, except when the parking facility is beneath the structure and is adequately screened, or in cases when an alternate location would have less environmental impact on the shoreline.</p>	<p>5. If permitted within shoreline jurisdiction, parking facilities shall be located landward of shoreline buffers identified in Tables 6-1 and 6-2.</p> <p>5. Accessory parking for authorized industrial, commercial and recreational water-oriented uses shall be allowed within the shoreline buffers identified in Tables 6.1 and 6.2</p> <p>10. Parking facilities serving individual buildings shall be located landward of the principal building being served, except when the parking facility is located within or beneath the structure and is adequately screened, or in cases when an alternate location would have less environmental impact on the shoreline.</p>	<p>The allowance of accessory parking, within the proposed shoreline buffers, for authorized water oriented uses will allow for the necessary support and public access to existing, redeveloped or future recreational and boating facilities per WAC 173-26-241(k).</p>

Attachment A: Matrix containing suggested alternative language by section for the Nov 2014 Draft SMP – Continued

Draft SMP Section	SMP Draft Language	Suggested Edit/action (Highlighted Bold Blue)	Explanation of Suggested Edit						
<p>Chapter 4 Policies and Regulations for Shoreline Modifications</p> <p>Section 4.2 Boating Facilities</p> <p>4.2.2 (9)(c) Regulations – Marinas and Moorage</p> <p>Page 4-5</p>	<p>c. Parking shall be located away from the water's edge and landward of shoreline buffers prescribed by this Program.</p>	<p>c. Accessory parking shall be located away from the water's edge and landward of shoreline buffers prescribed by this Program. Accessory parking shall be located away from the water's edge and landward of shoreline buffers prescribed by this Program. for authorized water-oriented uses shall be allowed within the shoreline buffers identified in Table 6-1 and 6-2.</p>	<p>The allowance of accessory parking, within the proposed shoreline buffers, for authorized water oriented uses will allow for the necessary support and public access to existing, redeveloped or future recreational and boating facilities per WAC 173-26-241(k).</p>						
<p>Chapter 6: Shoreline Buffers and Vegetation Conservation</p> <p>Table 6.1 Shoreline Buffer Widths (in feet) by Environment Designation - Marine Waterfront Parcels Only</p> <p>Page 6-5</p>	<p>Shoreline Environment Designation</p> <p>Marine Waterfront</p>	<table border="1"> <tr> <td data-bbox="776 1724 977 1989"> <p>Minor New Development on existing lots with < 200 ft of depth from OHWM to rear lot line</p> </td> <td data-bbox="776 1989 977 2253"> <p>Minor New Development on existing lots with ≥ 200 ft of depth from OHWM to rear lot line</p> </td> <td data-bbox="776 2253 977 2750"> <p>Major New Development, including all Land Divisions</p> </td> </tr> <tr> <td data-bbox="977 1724 1018 1989">50</td> <td data-bbox="977 1989 1018 2253">75</td> <td data-bbox="977 2253 1018 2750">100</td> </tr> </table>	<p>Minor New Development on existing lots with < 200 ft of depth from OHWM to rear lot line</p>	<p>Minor New Development on existing lots with ≥ 200 ft of depth from OHWM to rear lot line</p>	<p>Major New Development, including all Land Divisions</p>	50	75	100	<p>The Port is concerned that 100 foot buffer in the Marine Waterfront SED (Sekiu, Silver King, & Snow Creek) places restrictions on existing improvements and future redevelopment without corresponding ecological benefit. These areas currently provide the only major water-oriented commercial, boating facilities and water access in the County, but consist of a small portion of the entire County shoreline. The current and future water-oriented uses of these properties should be preserved.</p>
<p>Minor New Development on existing lots with < 200 ft of depth from OHWM to rear lot line</p>	<p>Minor New Development on existing lots with ≥ 200 ft of depth from OHWM to rear lot line</p>	<p>Major New Development, including all Land Divisions</p>							
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